

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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PROJECT LION LLC, d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and
PROJECT W LLC, d/b/a LA CAVE, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

-against-

BADGER MUTUAL INSURANCE COMPANY,

Defendant.

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STIPULATION TO EXTEND DEFENDANT'S TIME
TO RESPOND TO AMENDED COMPLAINT
(First Request)

WHEREAS on April 28, 2020, Plaintiffs PROJECT LION LLC d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and PROJECT W LLC, d/b/a LA CAVE (collectively, "Plaintiffs") filed the Complaint in this action; and

WHEREAS on or about May 11, 2020, Plaintiffs submitted a claim to Defendant (the "Claim"); and

WHEREAS on May 26, 2020, Defendant BADGER MUTUAL INSURANCE COMPANY ("Defendant") moved pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for dismissal of the Complaint; and

WHEREAS on June 16, 2020, Plaintiffs filed the Amended Complaint in this action alleging that they had submitted the Claim; and

WHEREAS on June 25, 2020, Defendant withdrew its motion to dismiss the Complaint; and

WHEREAS the parties have agreed, with a full reservation of rights by each, to extend Defendant's time to answer, move against, and/or otherwise respond to the Amended Complaint so that Defendant can evaluate Plaintiffs' Claim; and

WHEREAS this is the first stipulation for an extension of Defendant's time to answer, move against, and/or otherwise respond to the Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel that the time for Defendant to answer, move against, and/or otherwise respond to the Amended Complaint in this action is extended to and hereby is August 14, 2020.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in counterparts, and faxed or electronic signatures on this Stipulation shall be deemed original signatures.

Dated: June 30, 2020

*Counsel for Plaintiffs Project Lion LLC d/b/a
Crush d/b/a Greek Sneek, Project M LLC
d/b/a La Comida, and Project W LLC, d/b/a
La Cave*

THE O'MARA LAW FIRM, P.C.

By: /s/ David C. O'Mara

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SO ORDERED:



Cam Ferenbach
United States Magistrate Judge
Dated this 1st day of July, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of June, 2020, service of the foregoing **STIPULATION TO EXTEND DEFENDANT'S TIME TO RESPOND TO AMENDED COMPLAINT** was made upon each party in the case who is registered as an electronic case filing user with the Clerk, pursuant to Fed. Rule Civ. P. 5(b)(3) and LR IC 4-1, as follows:

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Respectfully submitted,
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/s/ Brian L. Bank
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